

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>Karen Martin</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>CASE NO. 1:16-cv-00846-JG</b>
	)	
<b>vs.</b>	)	
	)	
<b>HealthPRO Management</b>	)	<b>Judge James S. Gwin</b>
<b>Services, LLC, <i>et al.</i></b>	)	
	)	<b>Magistrate Judge</b>
<b>Defendants</b>	)	<b>William H. Baughman, Jr.</b>

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**Plaintiff Karen Martin's Preliminary Estimate of Attorneys' Fees and Costs  
Expected to be Incurred in this Matter**

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Plaintiff Nadine Sawaya (Ms. Sawya) respectfully submits her preliminary estimate and/or budget of the amount of fees and expenses expected to be the subject of her retaliation claim in this matter:

**ATTORNEYS' FEES**

Preliminary investigation, filing complaint	\$9,000.00
Procedural Motions Practice	0
Discovery	20,000.00
Dispositive Motions Practice	15,000.00
Settlement negotiations	5,000.00
Trial	<u>35,000.00</u>
<b>Total Attorneys' Fees</b>	<b><u>\$84,000.00</u></b>

**COSTS**

Depositions	\$12,000.00
Experts	0
Witness fees	1,000.00

Other	<u>5,000.00</u>
<b>Total Costs</b>	<b>\$ <u>16,000.00</u></b>

Respectfully submitted,

/s/ Neil Klingshirn  
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Attorneys for Plaintiff Karen Martin

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2016, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all the parties by operation of the Court's electronic filing system, including:

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Counsel for Defendants

Parties may access this filing through the Court's system.

/s/ Neil Klingshirn